

## REMARKS

### I. Introduction

Claims 1-95 were pending in the application. Claims 1-12, 14-15, 18-19, 22-30, 32-44, 46-47, 50-51, 54-62, 64-76, 78, 81, 84-93 and 95 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shoff et al. U.S. patent 6,240,555 (hereinafter "Shoff") in view of W3C Internationalization/Localization (W3C, 04-29-97; hereinafter "W3C"). Claims 13, 45 and 77 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shoff in view of W3C and further in view of Shaffer et al. U.S. patent 6,240,170. Claims 16-17, 20-21, 48-49, 52-53, 79-80 and 82-83 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shoff in view of W3C and further in view of Hendricks et al. U.S. patent 6,515,680. Claims 31, 63 and 94 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shoff in view of W3C and further in view of Cookson et al. U.S. patent 6,487,365.

The Examiner's rejections of claims 1-95 are respectfully traversed.

### II. The Rejections Of Claims 1, 33 and 65 Under 35 U.S.C. § 103(a)

Generally speaking, independent claims 1, 33 and 65 are directed towards an interactive television program guide that gives users the ability to manage the language characteristics of the interactive television program guide and content associated with one or more television programs. Specifically, applicants' approaches provide an intuitive and efficient interface to allow the user to select languages for

program audio and program guide display screen text using a single action. In general, audio tracks are used to play the different languages for television program audio, and program guide display screen text may include any text included in program guide display screens.<sup>1</sup> Accordingly, this single action of selecting a language provides for both the playing of audio and the displaying of program guide display screen text in the selected language.

The Office Action contends that it would have been obvious to one of ordinary skill in the art at the time of the invention to incorporate the teachings of W3C into the system of Shoff to render applicants' claims unpatentable. Applicants respectfully disagree. The Office Action admits Shoff does not provide a user with an opportunity to select a language (see Office Action, pages 3-4, 9-10, and 12). In an attempt to render applicants' claims obvious, the Office Action contends that W3C is directed toward this feature in stating that the "user equipment includes a language selector that enables the user to perform the necessary language selection" (Office action, pages 4, 10, and 12). Applicants submit, however, that W3C does not show or suggest this feature.

W3C is directed towards introducing language labels within HTML documents, or adding language labels to links in HTML documents (see W3C, pages 1-2). W3C is also directed towards using the language information contained in such links

---

<sup>1</sup> Program guide display screen text may include, for example, program guide button labels, program list labels, program grid labels, or text that indicates or otherwise describes program guide functionality, or any other text that may be considered part of the program guide itself and displayed in program guide display screens, such as, for example, titles, channels, descriptions and content information, rating information, text for advertisements, or any other suitable text-based information (see Applicants' Specification, page 8, lines 3-14).

when accessing or performing functions on documents. Examples of such functions are searching for documents in a particular language or running a spelling checker on documents. Applicants submit there is no aspect of W3C that shows language selection, let alone providing a user with an opportunity to select a language. Moreover, there is nothing shown or suggested by W3C indicating that the single action of language selection would serve two purposes -- namely the selection of a language for both the playing of audio and the displaying of program guide display screen text. Applicants further submit, as bolstered by the Office Action's aforementioned admission, that Shoff adds nothing further in this regard.

Shoff is directed towards an interactive entertainment system enabling the presentation of supplemental content along with programs. The supplemental content is text, graphics, video, or other media that may provide facts about the program, information on other episodes of a program, advertisements, or other content. Applicants submit that Shoff is not directed to any language functionality for program guide display screen text or playing of a program's audio. In fact, the only reference Shoff makes to languages concerns computer programming languages (e.g., HTML - Hypertext Markup Language), clearly not the languages referred to in applicants' claims 1, 33, and 65 (see Shoff, column 12, line 48-67).

Applicants also submit that the rejection should be withdrawn for the following separate and independent reasons. Neither Shoff, W3C, nor their combination shows or suggests a system in which a television program having a plurality of associated tracks having content, and wherein the content of each track is in a language and the content of at least two

different tracks are in different languages. The Office Action contends that Shoff discloses these features (see Office Action, pages 3-4, 9, and 11). However, as described above, Shoff is directed towards an interactive entertainment system for the presentation of supplemental content along with programs. The supplemental content is described as media that is related in some way to the program. The supplemental content, however, does not form an integral part of the audio-visual television program, like an audio track associated with a program, as in applicants' claims. Like its name suggests, the content of Shoff merely supplements the television program with additional information relating to the program. For at least this reason, Shoff fails to show or suggest a system in which a television program has a plurality of associated tracks.

Additionally, W3C neither shows nor suggests a television program or a television program with associated tracks, wherein the content of each track is in a language and the content of at least two different tracks are in different languages. It therefore follows that the combination of Shoff and W3C does not show or suggest a television program with associated tracks, wherein the content of each track is in a language and the content of at least two different tracks are in different languages, as claimed in applicants' invention. It further follows that neither Shoff, W3C, nor their combination shows or suggests user television equipment which plays the television program and one or more of the plurality of associated tracks.

Accordingly, for at least these reasons, applicants respectfully request that the rejection of claims 1, 33 and 65 under 35 U.S.C. § 103(a) be withdrawn.

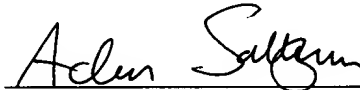
III. Dependent Claims 2-32, 34-64 and 66-95

Claims 2-32 are dependent from claim 1 and are allowable at least because claim 1 is allowable. Claims 34-64 are dependent from claim 33 and are allowable at least because claim 33 is allowable. Claims 66-95 are dependent from claim 65 and are allowable at least because claim 65 is allowable.

IV. Conclusion

The foregoing demonstrates that claims 1-95 are patentable. This application is therefore in condition for allowance. Reconsideration and allowance are accordingly respectfully requested.

Respectfully submitted,



---

Adam M. Saltzman  
Registration No. 52,188  
Agent for Applicants  
Fish & Neave IP Group  
Ropes & Gray LLP  
Customer No. 1473  
1251 Avenue of the Americas  
New York, New York 10020-1105  
Tel.: (212) 596-9000  
Fax: (212) 596-9090